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*Attorneys for Defendant*  
5 *Bank of America, N.A.*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 LKIMMY INC. a Nevada corporation,

9 Plaintiff,

10 v.

11 BANK OF AMERICA, N.A., a national banking  
association; IL KIM aka JULIUS KIM, an  
12 individual; DOES I through X; and ROE  
BUSINESS ENTITIES I through X; inclusive,

13 Defendants.  
14

Case No.: 2:20-cv-02184-RFB-VCF

**STIPULATION AND [PROPOSED]  
ORDER FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF'S MOTION  
TO REMAND**

**(First Request)**

15 Defendant BANK OF AMERICA, N.A. ("BANA") and Plaintiff LKimmy, Inc. ("Plaintiff"),  
16 by and through their respective counsel of record, hereby stipulate and agree to extend the deadline  
17 for BANA to file an opposition to Plaintiff's Motion to Remand (ECF No. 5) filed on December 14,  
18 2020. The deadline for BANA to respond to the Motion to Remand is currently set for December  
19 28, 2020. The parties hereby stipulate to extend the BANA's response deadline to January 5, 2021.  
20 Pursuant to LR 7-2, LKimmy's deadline to file a reply brief will be January 12, 2021.

21 This stipulation is submitted in compliance with LR IA 6-1. Counsel for BANA requests the  
22 proposed extension in order to ensure sufficient time to coordinate the filing of BANA's opposition,  
23 in consideration of BANA's and its counsel's respective schedules. Accordingly, the parties  
24 respectfully submit that the proposed extension is supported by good cause.

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1 The parties agree that the requested extension is not being requested in bad faith or to delay  
2 these proceedings unnecessarily.

3 This is the first stipulation for extension of time to file an opposition.

4 DATED this 24th day of December, 2020.

5 **WILSON, ELSER, MOSKOWITZ,  
6 EDELMAN & DICKER LLP**

7 */s/ Chad C. Butterfield*

8 CHAD C. BUTTERFIELD

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Attorneys for Defendant

Bank of America, N.A.

11 DATED this 24th day of December, 2020.

12 **HONG & HONG LAW OFFICES**

13 */s/ Joseph Y. Hong*

14 JOSEPH Y. HONG, ESQ.

15 Nevada Bar No. 5092

1980 Festival Plaza Dr., Suite 650

Las Vegas, NV 89135

Attorney for Plaintiff LKimmy, Inc.

18 **ORDER**

19 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

20 Dated this 28th day of December, 2020.

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24   
25 **RICHARD E. BOULWARE, II**  
26 **United States District Court**  
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